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8	ASHCON MINOIEFAR (State Bar #347583) aminoiefar@walkuplawoffice.com					
9	SHANIN SPECTER (Pennsylvania State Bar No. 40928)					
10						
11	ALEX VAN DYKE (CA State Bar No. 340379) alex.vandyke@klinespecter.com					
$_{12}$	Philadelphia, PA 19102 Telephone: (215) 772-1000 Facsimile: (215) 772-1359					
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$\begin{bmatrix} 14 \end{bmatrix}$						
15	ATTORNEYS FOR ALL PLAINTIFFS					
16	LIMITED CTATEC	DICTRICT COLIDT				
$17 \mid$		ORNIA, SAN FRANCISCO DIVISION				
18	JANE ROE, an individual; MARY ROE, an individual; SUSAN ROE, an	Case No. 4:24-cv-01562-AMO				
19	individual; JOHN ROE, an individual; BARBARA ROE, an individual;	DECLARATION OF JOHN ROE (A PSEUDONYM)				
20	PHOENIX HOTEL SF, LLC, a California limited liability company;	DECLARATION WITH TRUE NAME				
21	FUNKY FUN, LLC, a California limited liability company; and 2930 EL	OF DECLARANT TO BE FILED UNDER SEAL				
$22 \mid$	CAMINO, LLC, a California limited liability company,	DECLARATION WITH TRUE NAME				
23	Plaintiffs,	OF DECLARANT REDACTED TO BE PUBLICLY FILED				
24	v.					
25	CITY AND COUNTY OF SAN					
26	FRANCISCO, a California public entity,					
27	Defendants.					
28						

I,		declare	as	follows:
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- 1. I am a resident of the Tenderloin neighborhood in San Francisco and a plaintiff in the above captioned matter. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein.
- 2. I am an immigrant. I was born in South America and have resided in the United States for over 15 years. I am in my late 50s. I am a behavioral health worker. About four years ago my husband and I purchased a home near the corner of Turk and Larkin Street in the Tenderloin District of San Francisco.
- 3. The conditions around my home logistically and emotionally affect and drain me. Drug deals happen around my residence at all hours. Dealers dress a specific way and obviously belong to gangs. They are intimidating. I see people on the sidewalk inject drugs. People light fires in front of my home. I hear people in the throes of drug-induced psychotic episodes screaming. The medical examiner's van recently blocked my driveway to pick up the corpse of someone who overdosed. The images below fairly and accurately depict what regular occurs outside of my home:

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4. I sometimes hears gunshots. The drug-related violence leaves me fearful and in despair. I see biological hazards and garbage everywhere on the sidewalks and streets. I recently encountered someone defecating in my doorway. When I asked that

person to leave, the man threatened me.





- 5. I cannot walk on the sidewalks around my home because drug dealers and addicts gather and block passage. Encampments and stolen goods displayed for sale also make the sidewalks impassable. I must step off the sidewalk and into the street to bypass these dangers and obstacles.
- 6. I regularly report the problems around my home to the City, which rarely responds. Despite the constant open-air crime, I seldom see members of the SFPD on foot patrol in my neighborhood.
- The City on my behalf. I am involved in this lawsuit because I think it is critical that the City take immediate steps to address the deplorable conditions around my home and in my neighborhood. I am involved in this lawsuit because I believe it is imperative that the City to make our sidewalks and public spaces clean, safe and accessible. I am also involved in this lawsuit because I believe that the City should treat the Tenderloin like it does most other neighborhoods. I have no problem if my name and other relevant information about me is shared with the City, provided that the City treats it confidential. However, I am concerned that if my name is publicly revealed in court filings, then I would be targeted by drug dealers and other people who engage in criminal activity around my home. I am therefore conflicted about whether I would proceed with this lawsuit if the court ordered that my name be disclosed publicly.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on this 21st day of March, 2024, at San Francisco, California.

